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Monday, June 02, 2003

Docket Management System U.S. Department of Transportation Room Plaza 401 400 7th Street SW Washington, DC 20590 United States

Transmitted via Internet (<a href="http://dms.dot.gov">http://dms.dot.gov</a>) and Overnight Courier, return receipt requested Subject: Docket Number FAA-2002-13923

SkyQuest International is submitting the following comments in regard to the proposed rewrite of the current 14 CFR Parts 125 and 135 and writing in support of the letter drafted by the Regional Air Cargo Carriers Association (RACCA) dated May 27, 2003.

SkyQuest International is an associate member of RACCA and like many U.S. businesses, we are affected by the continued health, growth and prosperity of Regional Cargo Carriers. As stated in the RACCA letter referenced above, many of the regulations currently imposed on this industry date back to the early days of aviation, particularly the maximum payload of 7,500 lbs for Aircraft operated under FAR 135. This restriction imposes greater costs to U.S. consumers who rely on air transportation of goods and services at a reasonable price. By increasing this payload restriction, operators can greatly improve their efficiency and lower costs without affecting safety. We are in support of the FAA proposed increase to 18,000 lbs.

Our company is not an operator but one of the many companies that support the U.S. Aviation Industry. Our expertise is in availability, valuation and capability of commercial Aircraft. There is currently a growing fleet of modern Turbo-Prop Aircraft, which are becoming surplus to the needs of passenger carriers. These Aircraft, such as the Embraer EMB-120 and ATR-42 are in many ways equivalent and in some ways superior to modern jetliners in terms of safety and performance. These Aircraft are being displaced by Regional Jets and have natural applications to cargo. By allowing the FAR Part 135 cargo operators to take full advantage of this Aircraft type, our economy and consumers would be well served. Without the change to payload restrictions these assets will remain artificially surplus to the needs of the Air Cargo industry.

Thank you for the opportunity to comment on the proposed rewrite of Part 125 and 135 regulations. We hope that our comments and support of the positions stated by the RACCA are helpful in the upcoming discussions.

With Best Regards,

Gregory P. Melang President and CEO Jeff Melang Executive Vice President

cc: Stan Bernstein - Regional Air Cargo Carriers Association